

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA §
Plaintiff §
VS. § Case No. 3:10-CR-073-K
HORLEY RENGIFO-PAREJA §
Defendant §

**DEFENDANT HORLEY RENGIFO-PAREJA MOTION TO CONTINUE TRIAL
AND PRE-TRIAL DEADLINES**

The Defendant HORLEY RENGIFO-PAREJA in the above styled and numbered cause by and through his attorney of record, Carolyn A. Hill, hereby moves to continue the trial setting and pre-trial deadlines by at least thirty (30) days. Defendant Rengifo waives his speedy trial rights under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. and the Speedy Trial Provision of the Sixth Amendment to the United States Constitution to and including any new date set for the trial in this case as requested in Defendant HORLEY RENGIFO-PAREJA's Motion for Continuance and in support would show the following:

This is currently set for trial on August 17, 2015 and the pretrial motions are due on or before August 3, 2015.

Attorney Hill was appointed on June 18, 2015. As of the filing of this Motion, Counsel for Defendant has been reviewing voluminous discovery in this matter. Counsel for Defendant need additional time to review the voluminous discovery documents, investigate this matter further, research legal issues and consult with Defendant Rengifo. Counsel respectfully request that the Court also extend the associated pretrial deadlines in

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this matter.

Defense counsel would like additional time to prepare for trial and fully explore all possible plea negotiations as well as all avenues for a disposition of this case.

Defendant counsel has consulted with the government attorney, Mr. Mark Irish, and he is not opposed to this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant HORLEY RENGIFO-PAREJA prays for relief as requested in this Motion; and for such other and further relief, at law or in equity, general or specific, to which Defendant may be justly entitled.

Respectfully submitted,

Carolyn A. Hill

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies on the 15th day of July, 2015, Counsel for Defendant Rengifo conferred with Mark Irish, Assistant United States Attorney and he has advised that he is UNOPPOSED to the Motion.

Carolyn A. Hill

Carolyn A. Hill

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion on this the 16th day of July, 2015, Counsel for Defendant Rengifo submitted the foregoing document with the Clerk of the Court, Mark Irisih, Assistant United States via electronic means utilizing the Electronic Case Filing System System.

Carolyn A. Hill

Carolyn A. Hill